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## UNITED STATES BANKRUPTCY COURT DISTICT OF NEW JERSEY CAMDEN VICINAGE

CAMDEN VICINAGE	
In re:	Case No.: 24-14880/ABA
Mariah D. Hernandez	Hearing Date: June 11, 2024
Debtor	Chapter: 13 Motion to Extend the Automatic Stay

## **CERTIFICATION IN SUPPORT OF MOTION TO EXTEND AUTOMATIC STAY**

- I, Mariah Hernandez, am the Debtor in the above captioned matter, have personal knowledge of the facts and circumstances set forth herein, and make this certification under penalty of perjury.
- 1. On March 1, 2023, prior to filing this chapter 13 case I had filed a previous chapter 13 case number 23-11643 through the office of my attorney, Seymour Wasserstrum.
- 2. On April 19, 2024, my previous case was dismissed for failure to make my monthly trustee payments because my work hours decreased and my Trustee payment was raised from 300 per month to 900 and it was just unattainable.
- 3. On May 13, 2024, I filed a new chapter 13 case number 24-14880, within one year of my previous case being pending.
- I filed this case to stop an eviction proceeding against me which was scheduled for May 15, 2024.

- 5. My attorney has explained to me that I need to overcome a presumption of a bad faith filing, and I believe I can do that based upon a substantial change in my financial and personal affairs.
- 6. I receive section 8 assistance and reside with my 9-year-old daughter who has autism and suffers chronic seizures. If I do not complete my chapter 13, I will lose my section 8 assistance.
- 7. I have had the same job for 13 years and my hours have increased.
- 8. I am paid weekly, and I have no objection to a wage order being issued to deduct 25% of the plan payment per week.
- 9. I believe I can successfully complete this case based upon the fact that my mother,
  Marta Marrero, will help me financially at this time. Unlike in my previous case, she
  is totally willing to help me financially so I can stay at my home with my daughter.

  She brings home \$500.00 a week and has told me she will contribute as much as is
  necessary so that my case will work.
- 10. Based upon these changed circumstances, I am in a better position to proceed towards a confirmed Chapter 13 Plan and continue with plan payments.
- I have filed my petition in good faith, and I definitely believe that my chapter 13 plan that will be submitted will be confirmed and that I will be able to fully perform under the terms of the plan.

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12. Based upon the aforementioned significant changes in my financial situation, as well as my overall commitment and understanding that this is likely my last opportunity to save my home, I humbly request that the automatic stay as to all creditors should be extended.

Dated: 5/21/2024

/s/Mariah Hernandez

Mariah Hernandez

DocuSigned by:

Debtor